

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

SEANTELL D. CRENSHAW,

Plaintiff,

v.

**KELLY AEROSPACE POWER SYSTEMS,
INC.,**

Defendant.

Case No.

2:06cv276-WKW

REPORT OF PARTIES' PLANNING MEETING

Pursuant to Federal Rule of Civil Procedure 26(f) and the Court's Order dated May 23, 2006, a meeting was held on May 30, 2006 via telephone and was attended by:

- Jay Lewis on behalf of Plaintiff Seantell D. Crenshaw
- Kelly F. Pate on behalf of Defendant Kelly Aerospace Power Systems, Inc.

1. **Pre-Discovery Disclosures.** The parties will exchange the information required by Federal Rule of Civil Procedure 26(a)(1) on or before June 13, 2006.
2. **Discovery Plan.** The parties jointly propose to the Court the following discovery plan:

The likely subjects of discovery are: the facts and circumstances of this case, including but not limited to: plaintiff's work history; plaintiff's educational background; plaintiff's job performance and attendance; the alleged discrimination; the alleged violations of Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e *et seq.*, 42 U.S.C. Section § 1981, and the Americans with Disabilities Act, 42 U.S.C. Section § 12112(b) *et seq.*; the alleged damages; the anticipated testimony of witnesses; issues that arise during the course of discovery and/or that are raised in any dispositive motion or response to any dispositive motion; and such other material issues that may become relevant as the case develops.

- a. All discovery commenced in time to be completed by February 19, 2007.
- b. Maximum of 25 interrogatories by each party to each party. Responses due 30 days after service.
- c. Maximum of 25 requests for admission by each party to each party. Responses due 30 days after service.

- d. Maximum of 25 requests for production of document by each party to each party. Responses due 30 days after service.
- e. Maximum of 5 depositions by Plaintiffs to Defendant and 5 by Defendant to Plaintiffs. Depositions limited to eight hours.
- f. Reports from retained experts under Rule 26(a)(2) due:

from Plaintiffs by October 19, 2006; and
from Defendant by November 2, 2006.
- g. Supplementation under Rule 26(e) due reasonably upon knowledge of additional information.

3. **Other Items.**

- a. The parties do not request a conference with the Court before entry of the scheduling order.
- b. The parties request a pretrial conference on or around February 19, 2007.
- c. Plaintiffs should be allowed until October 23, 2006 to join additional parties and to amend the pleadings.

Defendant should be allowed until October 30, 2006 to join additional parties and to amend the pleadings.
- d. All potentially dispositive motions should be filed on or before November 21, 2006.
- e. Settlement cannot be realistically evaluated prior to the completion of preliminary discovery.
- f. Final lists of trial evidence under Federal Rule of Civil Procedure 26(a)(3), both witnesses and exhibits, should be due from the parties on or before February 14, 2007.
- g. Parties should have 14 days after service of final lists of trial evidence to list objections under Rule 26(a)(3).
- h. The case should be ready for trial by this Court's March 26, 2007 trial term. At this time, the trial is expected to take approximately 2 days, excluding jury selection.

Respectfully submitted this 31st day of May, 2006.

/s/ Kelly F. Pate

One of the attorneys for Defendant,
Kelly Aerospace Power Systems, Inc.

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/s/ Jay Lewis

One of the attorneys for Plaintiff,
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